

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

TIMOTHY NELSON,)	
)	
Plaintiff,)	
)	Cause No. 4:06-CV-674 JCH
vs.)	
)	
)	
DORN SCHUFFMAN, <i>et al.</i> ,)	
)	
Defendants.)	

PROPOSED STATEMENT OF THE CASE

Plaintiff Timothy Nelson is a former detainee at the Missouri Sexual Offenders Treatment Center in Farmington, Missouri ("MSOTC").¹ He has filed suit against the Defendants pursuant to 42 U.S.C. §1983, claiming that Defendants violated his constitutional rights. Specifically, Plaintiff claims that the Defendants were deliberately indifferent to his constitutional rights in that they: (1) failed to protect him from a substantial risk of harm by another resident; 2) failed to provide him with necessary medical treatment; and 3) transferred him to a severely restrictive ward in retaliation for filing complaints against Defendants. Defendants deny these allegations.

¹ Upon information and belief, this facility is currently known as the Sexual Offenders Rehabilitation Treatment Service.

Dated: January 19, 2011

GREENSFELDER, HEMKER & GALE, P.C.

By /s/ Samuel Henderson
Kathi L. Chestnut, #2814
klc@greensfelder.com
Samuel Henderson, #511531
sh@greensfelder.com
10 South Broadway, Suite 2000
St. Louis, Missouri 63102
(314) 241-9090 – Telephone
(314) 345-5499 – Fax

Attorneys for Plaintiff Timothy Nelson

CERTIFICATE OF SERVICE

The undersigned certifies that on this 19th day of January, 2011, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Jason Retter
Assistant Attorney General
P.O. Box 861
St. Louis, Missouri 63188

/s/ Samuel Henderson